



MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Marina Moraru  
Special Assistant Corporation Counsel  
Office: 212) 356-2456

**VIA ECF**

Hon. Alvin K. Hellerstein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

November 25, 2024

SO ORDERED. Time to respond to the complaint and file the next joint status letter is extended to December 11, 2024. The status conference scheduled for December 6, 2024 is adjourned to December 13, 2024 at 10:00 a.m.

12.2.24 /s/ Alvin K. Hellerstein

Re: *L.M. v. New York City Dep't of Educ.*, 24-cv-4289 (AKH)(SN)

Dear Judge Hellerstein:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 2-week extension of Defendant's time to respond to the Complaint, from November 27 to December 11, 2024. This is the third request for an extension, the first extension having been granted on August 7, 2024 (ECF 9) and the second request having been granted on October 28, 2024 (ECF 11). Defendant also respectfully requests that the joint status letter due November 27 be adjourned to December 11, 2024 as well. Plaintiff consents to this request.

Further, Defendant respectfully requests an adjournment of the Initial Pretrial Conference ("IPTC") currently scheduled for December 6, 2024 until December 16, 2024 or a future date convenient to the Court. Plaintiff does not consent to this request, stating the IPTC will be helpful in advancing the case. Defendant has made a full authority settlement offer on November 20, 2024, which Plaintiff is considering. I request the short adjournment of the IPTC to allow for the possibility of settlement without additional fees being incurred due to the IPTC, which will in turn make the settlement more difficult if not impossible. This office has resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences, or even the need to file an Answer. Defendant is hopeful this matter will be resolved as well.

Accordingly, Defendant respectfully requests (a) that Defendant's time to respond to the complaint be extended to December 11, 2024, with a next joint status letter due that same date, and (b) an adjournment of the IPTC to December 16, 2024 or to a future date convenient to the Court.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.

Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)